



Harford Transit LINK

2015 – 2017 Title VI Implementation Plan

Title VI of the Civil Rights Act of 1964

Honorable Barry Glassman

Harford County Executive

Adopted Date October 2009

(Revised Date January 29, 2016)

Department of Economic Development

Karen Holt

Director, Department of Economic Development

Harford Transit LINK

Robert K. Andrews, CCTM, CSSO

Administrator

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<http://www.harfordtransitlink.org>

This document is available in alternate format.

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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and State transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how the Harford Transit LINK incorporates nondiscrimination policies and practices in providing services to the public.

II. OVERVIEW OF SERVICES

The Harford Transit LINK operates as part of an umbrella organization known as the Department of Economic Development for Harford County, Maryland (hereinafter “Harford County”). Harford Transit LINK is a fixed-route public transit system that operates nine routes on weekdays and a Regional JARC (Job Access and Reverse Commute) Route in partnership with Cecil County. Harford Transit LINK also provides demand response services five days a week and during evening hours through our New Freedom Service for special populations. The routes connect major shopping and employment areas of Harford County. Of the nine routes, three operate primarily within the confines of the towns of Bel Air, Aberdeen, and Edgewood. The remaining routes connect the population centers along the U.S. 40 corridor and Bel Air. The Regional JARC Route connects with population centers in Cecil County as-well-as the Veteran’s Administration Hospital at Perry Point.

Harford Transit LINK provides creative, pragmatic planning and research to address current issues and to explore future needs and options that could benefit the County’s citizens. The agency works closely with Maryland’s Transit Administration (MTA) and provides a solid base of technical competence for objective and innovative regional planning, in which the sum of regional and local expertise is greater than the individual parts. As a transit agency, Harford Transit LINK does not duplicate the activities of the State operating agencies but supports their needs with complementary planning and advocacy. Harford Transit LINK performs strategic analyses of trends, consequences, and options related to growth and transportation issues. It is a center for the collection, analysis, and dissemination of information vital to businesses, citizens, civic groups/organizations and governments in the region.

Our Mission

The mission of the Harford Transit LINK is to provide the public with a safe and efficient transportation system that increases access and mobility, reduces congestion, improves the environment and supports economic development, thereby enhancing the quality of life throughout Harford County.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Harford Transit LINK is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Harford County, Maryland's, Office of Human Resources Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.


Signature of Authorizing Official – Honorable Barry Glassman

4.2.15
Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

IV. NONDISCRIMINATION ASSURANCES TO MTA

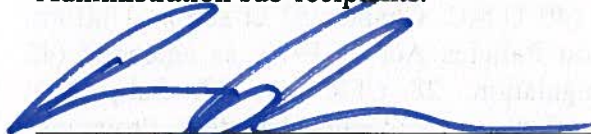
In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Maryland Transit Administration (MTA) submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to the MTA at the time of grant application and award, in our case, with the Annual Transportation Plan (ATP, the public transportation grant application) the Harford Transit LINK submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Harford County, Maryland (i.e. Harford Transit LINK) confirms to MTA the County's/Agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Harford County, Maryland/Harford Transit LINK, Title VI Implementation Plan 2015 - 2017. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Harford Transit LINK's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Signature of Authorizing Official – Honorable Barry Glassman
County Executive, Harford County, Maryland
Signing on behalf of the Harford County LINK

4/2/15
Date

COPY of COUNTY RESOLUTION

COUNTY COUNCIL

OF

HARFORD COUNTY, MARYLAND

Resolution No: -15

Legislative Session Day

February 3, 2015

Introduced by Council President Slutzky
at the request of the County Executive

A RESOLUTION authorizing the County Executive to file an application with the Maryland Transit Administration of the Maryland Department of Transportation for SSTAP (Statewide Special Transportation Assistance Program) and Section(s) 5303, 5304, 5305, 5307, 5309, 5310, 5311, 5316, 5317, 5318 Formula and Discretionary Operating and Capital grant programs under the Federal Transit Act, and for any additional transportation grant funds which may be available under the Federal Transit Act during the fiscal year.

WHEREAS, the Maryland Transit Administration is the designated recipient in Maryland for grants under the Federal Transit Act; and

WHEREAS, the Administrator of the Maryland Transit Administration of the Maryland Department of Transportation is authorized to make grants to counties and to local governments for mass transportation program projects; and

WHEREAS, the contract for financial assistance will impose certain obligations upon the applicant, including the provision by it of the local share of the project costs in the program; and

WHEREAS, it is required by the United States Department of Transportation in accordance with the provisions of Title VI of the Civil Rights Act of 1964 that, in connection with the filing of an application for assistance under the Federal Transit Act, the applicant give an assurance that it will comply with Title VI of the Civil Rights Act of 1964 and the United States Department of Transportation requirements thereunder; and

RESOLUTION NO. 001-15

1 WHEREAS, the Maryland Transit Administration is the designated recipient in Maryland for
2 grants under the Federal Transit Act; and

3 WHEREAS, the Administrator of the Maryland Transit Administration of the Maryland
4 Department of Transportation is authorized to make grants to counties and to local governments for
5 mass transportation program projects; and

6 WHEREAS, the contract for financial assistance will impose certain obligations upon the
7 applicant, including the provision by it of the local share of the project costs in the program; and

8 WHEREAS, it is required by the United States Department of Transportation in accordance
9 with the provisions of Title VI of the Civil Rights Act of 1964 that, in connection with the filing of
10 an application for assistance under the Federal Transit Act, the applicant give an assurance that it
11 will comply with Title VI of the Civil Rights Act of 1964 and the United States Department of
12 Transportation requirements thereunder; and

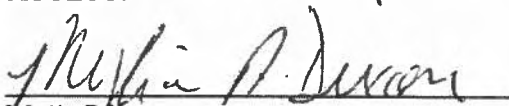
13 WHEREAS, it is the goal of the applicant that disadvantaged business enterprise, and where
14 applicable, minority business enterprise, be utilized to the fullest extent possible in connection with
15 this project, and that definite procedures shall be established and administered to ensure that
16 disadvantaged business, and where applicable, minority business, shall have opportunities for
17 construction contracts, supplies, equipment contracts or consultant and other services.

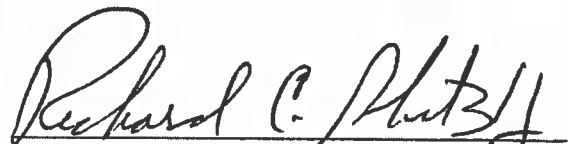
18 NOW, THEREFORE, BE IT RESOLVED by the County Council of Harford County,
19 Maryland, that the filing of the aforesaid application be endorsed; and

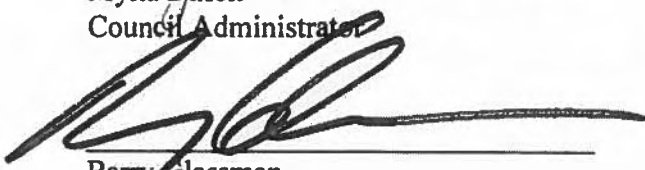
20 BE IT FURTHER RESOLVED that the County Executive is hereby requested to endorse this
21 resolution, thereby indicating approval thereof; and

22 BE IT FURTHER RESOLVED that copies of this resolution be sent to the Maryland Transit
23 Administration of the Maryland Department of Transportation.

ATTEST:


Mylia Dixon
Council Administrator


Richard C. Slutzky
President of the Council


Barry Glassman
County Executive

ADOPTED: February 10, 2015

RESOLUTION NO. 001-15

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of Harford County, Maryland, and County Executive, the Harford County Department of Community Services - Human Relations Manager is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Title VI Manager Responsibilities

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare an annual report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and if/where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI Responsibilities of the Agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data Collection

To ensure that Title VI reporting requirements are met, the Human Relations Manager maintains:

- A database/log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database/log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, Harford Transit LINK is required to submit a Quarterly Report Log to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. Harford Transit LINK will also maintain and provide to the MTA on an annual basis the log of public outreach and involvement activities undertaken to ensure that minority and low-income people have meaningful access to these activities. The reporting form for the report will be submitted with the ATP as requested by the MTA.

Further, Harford Transit LINK submits to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not changed since the previous submission, indicating date.

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Harford Transit LINK's Limited English Proficiency (LEP) plan based on Harford County's Four Factor Analysis
- Harford Transit LINK's procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the Harford Transit LINK since the last submission
- A copy of Harford Transit LINK's agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

The annual Title VI report and updates are submitted to the MTA each year as part of the Annual Transportation Plan (ATP), or grant application submission.

3. Annual Review of Title VI Program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager and Liaison(s) will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of Information Related to the Title VI Program

Information on Harford Transit LINK's Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the public outreach and involvement section of this document, and in other languages when necessary according to the LEP plan as-well-as federal and state laws/regulations.

5. Resolution of Complaints

Any individual may exercise his or her right to file a complaint with Harford Transit LINK if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Harford Transit LINK will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures, as described in Section VI - Procedures for handling and recording Title VI investigations/complaints/lawsuits. All Title VI complaints and their resolution will be logged as described under Section VI, **General Title VI Responsibilities of the Agency**, number **1. Data Collection** above, and reported annually (in addition to the three day requirement) to MTA.

6. Written Policies and Procedures

Harford Transit LINK's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Title VI Annual Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal Education

Harford Transit LINK's employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (and any LEP requirements based on Four Factor Analysis), required data that must be gathered and maintained. In addition, training will be provided when any Title VI related policies or procedures change (agency-wide training), or when appropriate, in resolving a complaint (which may be for a specific individual or for the entire agency, depending the on the complaint). Title VI training is the responsibility of the Human Relations Manager and/or the Lead Driver/Trainer for the Harford Transit LINK.

8. Title VI Clauses in Contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Harford Transit LINK's contract/PO will include the non-discrimination clauses attached below. The Title VI Manager will work with the Manager(s) and Administrator for the Harford Transit LINK and the Procurement Officers for Harford County to ensure appropriate non-discrimination clauses are included.

Title VI Clauses in Contracts

The text below, in its entirety, will be in all contracts subject to Title VI regulations, entered into by Harford County, Maryland. All of the text except the final section, entitled “Incorporation of Provisions,” should be included in any contract entered into by any contractor.

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “Contractor”), agree as follows:

1. Compliance with Regulations

The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination

The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Part B of the Regulations.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment

In all solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, or national origin.

4. Information and Reports

The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance

In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, Harford County, Maryland shall impose such contract sanctions as the Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration may determine to be appropriate, including, but not limited to:

- Withholding of payments to the Contractor under the contract until the Contractor complies; and/or
- Cancellation, termination, or suspension of the contract, in whole or in part.

6. Incorporation of Provisions

The Contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontractor or procurement as Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request Harford County, Maryland enter into such litigation to protect the interests of the State and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

Part B

Lease/Deed Provisions

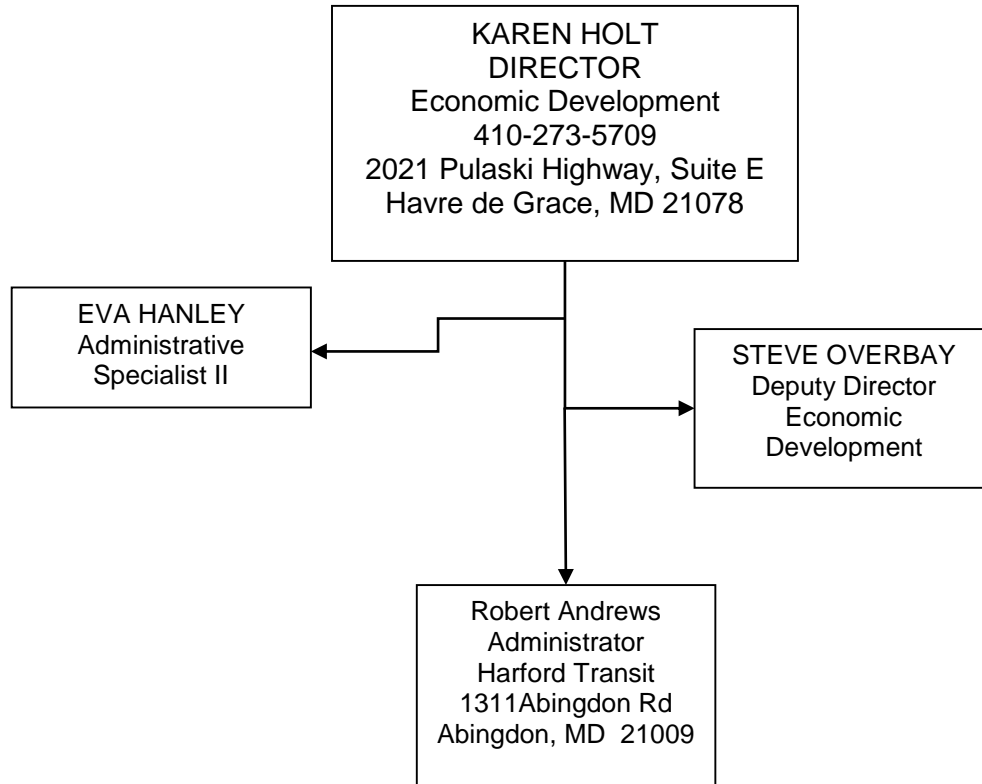
Upon receipt of federal financial assistance to construct a facility or part of a facility, the Recipient agrees to include these clauses in all future deeds, licenses, leases, permits, or similar instruments entered into by Harford County, Maryland pursuant to the provisions of Title VI.

Assurances, item 7.

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land, that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this lease, for a purpose for which a Harford County program or activity is extended, or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended. That in the event of breach of any of the above nondiscrimination covenants, the COUNTY shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

Organization Chart of Title VI Responsibilities

Department of Economic Development Organizational Chart

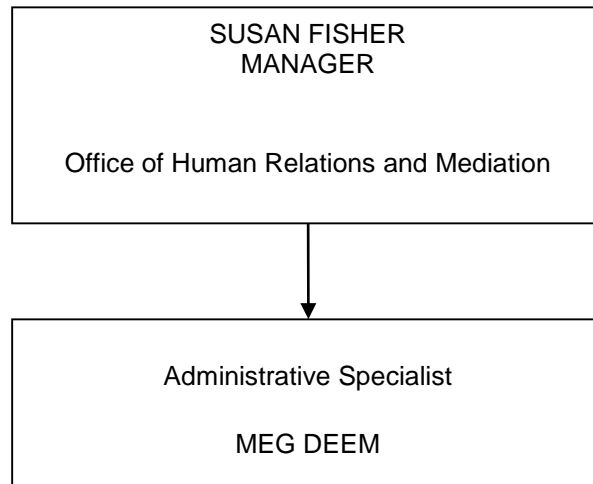


For the Harford Transit LINK Organization Chart, please see page 16 below.

DEPARTMENT OF COMMUNITY SERVICES
OFFICE OF HUMAN RELATIONS ORGANIZATIONAL CHART

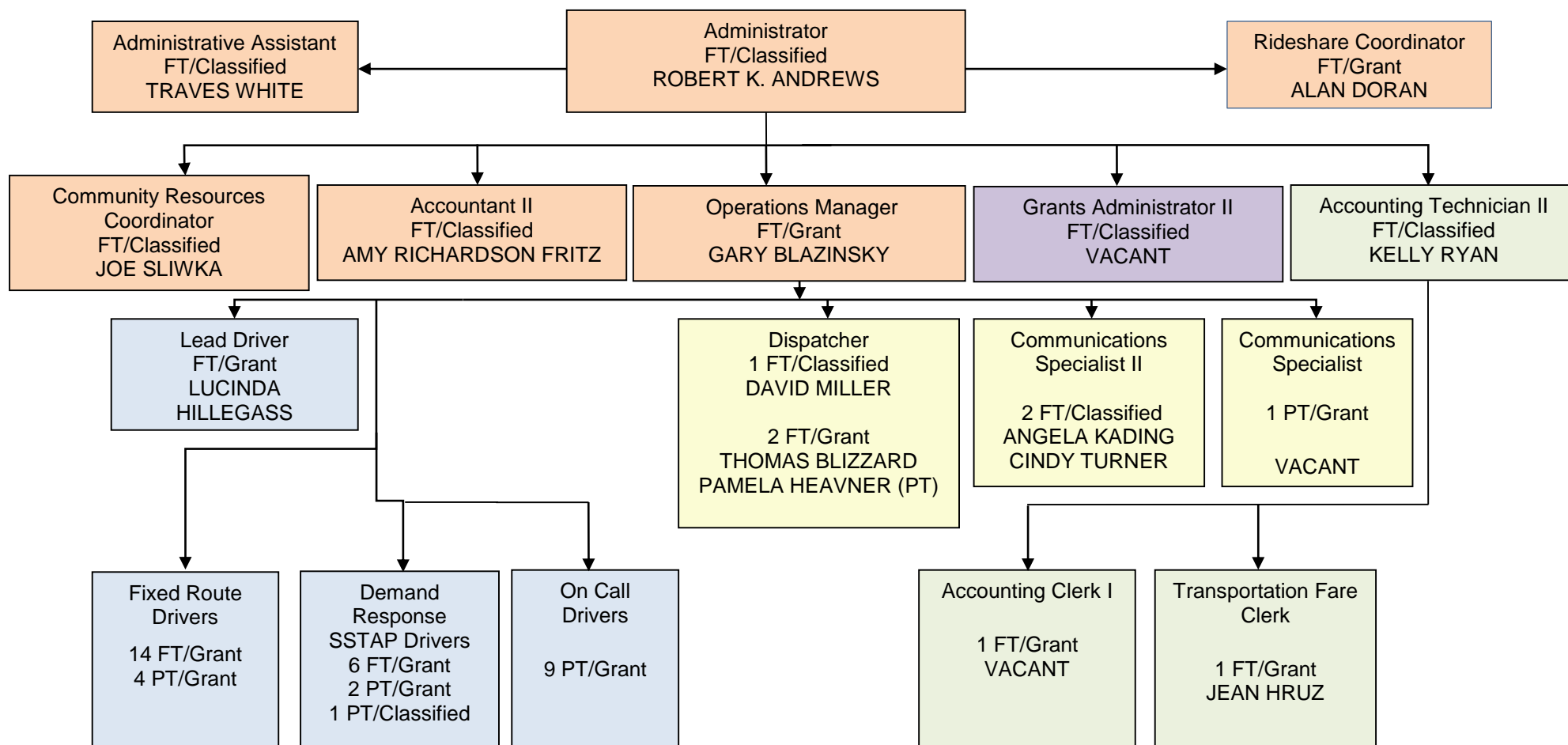
125 N. Main Street., Bel Air, Maryland 21014

The Department of Community Services' Office of Human Relations acts as a liaison for human relations matters between Harford County Government, various governmental and private agencies, and the local community. For Harford County, Maryland the Human Relations Manager is also considered the Title VI Manager.





Office of Economic Development Harford Transit **LINK**



VII. GENERAL REPORTING REQUIREMENTS

REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Harford Transit LINK shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency (bulletin board), including in federally-funded vehicles. The Sample Public Notice is included as APPENDIX A - Title VI Notice to the Public; Locations where posted are listed.

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a written complaint with Harford Transit LINK, if that person believes that s/he have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to the three day requirement) to the MTA. A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Harford Transit LINK includes the following language to the best of our ability on all printed information materials (within reason), on the agency's website, in press releases, in public notices, in published documents and on posters on the interior of each vehicle operated in passenger service:

Title VI Notice to the Public - Printed Material Language

The Harford Transit LINK is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Harford Transit LINK's nondiscrimination policies and procedures, or to file a complaint, please visit the website at humanrelations@harfordcountymd.gov or contact Susan Fisher, Manager, Office of Human Relations, 125 N. Main Street, Bel Air, MD 21014.

Abbreviated Title VI Notice to the Public

The following abbreviated version of the above paragraph may be used in publications where space or cost is an issue and in classified newspaper announcements:

Harford Transit LINK is committed to complying with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information on Title VI, go to <http://www.harfordcountymd.gov> or call 410-638-4739.

Instructions for filing Title VI complaints are posted on the agency's website and on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within Harford Transit LINK's policy manual and Ride Guide brochure.

A copy of Harford Transit LINK's Title VI Complaint Form is attached as APPENDIX B.

Procedures for Handling and Reporting Investigations/complaints and Lawsuits

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by Harford County, Maryland, as well as to sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Manager may be utilized for resolution. The Title VI Manager will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Should any Title VI investigations be initiated by the FTA and/or MTA, or any Title VI lawsuits filed against Harford Transit LINK, the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with Harford County's Title VI Manager (Manager, Office of Human Relations).

The complaint must meet the following requirements and must be filled as stated below:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaint shall be in writing and signed by the complainant(s) and notarized when feasible. The attached complaint form will be provided to the complainant upon request. See Appendix B.
- b. The complainant should include:
 - The complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
 - The date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
 - A description of the alleged act of discrimination
 - The location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - An explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - If known, the names and/or job titles of those individuals perceived as parties in the incident
 - Contact information for any witnesses
 - Indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)
- c. The complaint shall be submitted to the Title VI Manager at 125 N. Main Street, Bel Air, MD 21014 and /or humanrelations@harfordcountymd.gov

- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail the original signed document (notarized when feasible) which was faxed or e-mailed in order for Harford County, Maryland, to be able to process it. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
2. Upon receipt of the complaint, the Title VI Manager will determine its jurisdiction, acceptability, and need for additional information, as-well-as investigate the merit of the complaint. In cases where the complaint is against one of Harford County's sub-recipients of federal funds, Harford County will assume jurisdiction and will investigate and adjudicate the case. Complaints against Harford County, Maryland, and/or the Harford Transit LINK will notify the Maryland Department of Transportation's (MDOT) Modal Administration responsible for reporting requirements to the federal government within three business days, i.e. Maryland Transit Administration's (MTA) Office of Equal Opportunity (OEO) and/or the Federal Transit Administration, as appropriate, for proper disposition pursuant to their procedures. The Title VI Manager will also enter the complaint into the database/log.
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The allegation(s) must involve a covered basis such as race, color, or national origin.
 - c. The allegation(s) must involve a program or activity of a federal-aid recipient, sub-recipient, contractor, or, in the case of ADA allegations, an entity open to the public.
 - d. The complainant(s) must accept reasonable resolution based on Harford County, Maryland's, administrative authority (to be reasonably determined by Harford County). The complainant still retains the right to appeal according to regulations.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. Once Harford County, Maryland, or the MDOT Modal Administration, MTA decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within fourteen (14) calendar days. The parties will be offered the opportunity to resolve their differences through mediation using the County's Community Mediation Program. The complaint will receive a case number and will then be logged into Harford County, Maryland's or MDOT's records identifying its basis and alleged harm, and the race, color, and national origin of the complainant.
6. In cases where Harford County, Maryland assumes the investigation of the complaint, Harford County, Maryland, will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have thirty (30) calendar days from the date of Harford County, Maryland's, written notification of acceptance of the complaint to furnish his/her notarized (when feasible) response to the allegations.
7. In cases where Harford County, Maryland, assumes the investigation of the complaint, within sixty (60) calendar days of the acceptance of the complaint, Harford County, Maryland's, Investigator* will prepare an investigative report for review by the agency's legal representative within the Department of Law and the Director of Economic Development. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

- ***This can be one of Harford County, Maryland's, Law Department, Title VI Liaisons, or Harford County, Maryland's, Title VI Manager or Designee.**
8. The investigative report and its findings will be sent to Harford County, Maryland's, Department of Law for review. The Department of Law will review the report and associated documentation and will provide input to the Investigator within ten (10) calendar days.
 9. Any comments or recommendations from the Department of Law will be reviewed by Harford County, Maryland's, Investigator. The Investigator will discuss the report and recommendations with the Director of Economic Development within ten (10) calendar days. The report will be modified as needed and made final for its release.
 10. Harford County, Maryland's, final investigative report and a copy of the complaint will be forwarded to the MDOT Modal Administration, MTA's OEO, within ninety (90) calendar days of the acceptance of the complaint. The MTA's, OEO will share the report with the appropriate organization within the federal DOT and/or FTA, Washington Division Offices, according to the MTA's written policies as part of its Annual Title VI Update and Accomplishment Report.
 11. Harford County will notify the parties of its preliminary findings, which are subject to concurrence from the MTA's, OEO. MDOT's/MTA's OEO will issue the final decision to Harford County, Maryland based on Harford County, Maryland's investigative report.
 12. Once the MDOT's/MTA's OEO issues its final decision, Harford County, Maryland, will notify all parties involved of such determination. MDOT's/MTA's final determination is not subject to an appeal.
 13. The MDOT will also serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Harford County, Maryland. The MDOT Modal Administration responsible will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.
 14. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located or an interview cannot be scheduled after reasonable attempts.

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

Harford Transit LINK through the Title VI Manager shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

See Appendix C and C-1 for examples of forms.

PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

Introduction

Public outreach and involvement applies to and affects Harford Transit LINK's mission and work program as a whole, particularly agency efforts and responsibilities related to Harford Transit LINK's service planning. The overall goal of Harford Transit LINK's public outreach and involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions by Harford Transit LINK. In seeking public comment and review, Harford Transit LINK makes a concerted effort to reach all segments of the population; including people from protected communities, and organizations identified as representing the protected classes. Harford Transit LINK utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Harford Transit LINK utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time as determined by our four factor analysis.

Harford Transit LINK has established a public participation plan or process that will guide how, when, and how often specific public participation activities should take place and which specific measures are most appropriate.

Harford Transit LINK will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, the frequency of requests for information and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at transit stations, stops, and in vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

See Appendix D for:

Examples/Summary of effective public outreach efforts that we may utilize.

ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

See Appendix E for LAP

LANGUAGE ASSISTANCE PLAN

Harford Transit LINK

LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

SERVING PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Strategies for Informing and Engaging Individuals with Limited English Proficiency (LEP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by the Harford Transit LINK is based on FTA guidelines.

As required, the Harford Transit LINK developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, the Harford Transit LINK has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP Persons could be a significant market for public transit and reaching out to these individuals could help increase their utilization of transit. Therefore, it may make good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

As required by the MTA, Harford Transit LINK (through a county-wide effort) conducted a four-factor analysis in an effort to help determine whether additional language assistance services are needed, and if so, what types of services would be best to serve our LEP population.

The "four-factor analysis" process included:

- 1) Determining the number and proportion of LEP individuals within the population;
- 2) The frequency with which LEP individuals will come in contact with the program;
- 3) The importance of the program to people's lives; and
- 4) The resources available to provide translation services.

The four factors are more specifically outlined below.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

What the Guidance Says:

"The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed (emphasis added). Ordinarily, persons "eligible to be served, or likely to be directly affected, by" a recipient's programs or activities are those who are in fact, served or encountered in the eligible service population. This population will be program-specific, and includes persons who are in the geographic area that is part of the recipient's service area...When considering the number or proportion of LEP individuals in a service area, recipients should consider LEP parent(s) whose English proficient or LEP minor children and dependents encounter the services of DOT recipients.

Recipients should first examine their prior experiences with LEP individuals and determine the breadth and scope of language services that are needed. In conducting this analysis, it is important to: Include language minority populations that are eligible beneficiaries of recipients' programs, activities, or services but may be underserved because of existing language barriers; and consult additional data, for example, from the census, school systems and community organizations, and data from state and local governments, community agencies, school systems, religious organizations, and legal aid entities.

The focus of the analysis is on lack of English proficiency, not the ability to speak more than one language. Note that demographic data may indicate the most frequently spoken languages other than English and the percentage of people who speak that language but speak or understand English less than well. People who are also proficient in English may speak some of the most commonly spoken languages other than English." (DOT LEP Guidance Section V (1)).

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2008-2012)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Harford Transit LINK's service area. The total population speaking English "not well" and "not at all" is 2.32% according to the ACS Census data provided by the MTA. Spanish is the largest group that speaks a language other than English at .85%. The 5% safe harbor is used as determined by the FTA. The frequency and extent which LEP individuals come into contact with Harford County is estimated to be quite low. However, we believe any opportunity to increase public comment on long-range decision-making is a worthwhile investment. Harford County encourages public comment on its policies, programs, and funding cycles, and therefore would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals. Harford County has limited resources to pursue translations services; however we believe that it is a priority. By finding a low cost point of access for LEP individuals, we would provide them with a way to learn about governmental activities and access all the services that are available to them.

Information from the ACS Census also provides more detail on the specific languages that are spoken by those who report that they speak English "not well" and "not at all." Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Limited English Proficiency (LEP) populations in Harford County, Maryland

Total Population	230,539	
LEP Population	5,345	2.32%
Five Largest LEP Populations	Persons	Percent
Spanish and Spanish Creole	1953	0.85%
Chinese	427	0.19%
Tagalog	378	0.16%
Vietnamese	295	0.13%
German	248	0.11%

It is noted that there are relatively low numbers of LEP persons in the service area - no language is spoken by over 5% and only one language has a total of more than 1,000 persons in the LEP population. Therefore Harford County LINK provides translations of critical documents as noted throughout this plan.

Factor 2: The Frequency with which LEP Individuals come into contact with your programs, activities, and services.

What the Guidance Says:

"Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed (emphasis added). The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily. Recipients should also consider the frequency of different types of language contacts, as frequent contacts with Spanish-speaking people who are LEP may require certain assistance in Spanish, while less frequent contact with different language groups may suggest a different and/or less intensified solution. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent. However, even recipients that serve LEP persons on an unpredictable or infrequent basis should use this balancing analysis to determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate.

It may be as simple as being prepared to use a commercial telephonic interpretation service to obtain immediate interpreter services. Additionally, in applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups."(DOT LEP Guidance Section V (2)).

Factor 2: Assessment of frequency with which LEP individuals come into contact with the transit services or system

Harford Transit LINK reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Calls to Harford County's Language Link customer service telephone line;
- Visits to the agency's headquarters, i.e.: contact with office managers and staff;
- Attendance at community meetings or public hearings hosted by the Harford Transit LINK;
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers).

LEP Services Provided by Harford County

Records of language translations usage since we first contracted for services:

For a Summary of Findings please refer to the list below and the Chart on the next page:

<u>Year</u>	<u>Amount</u>	<u>Primary Usage Details</u>
FY 03	\$155.00	Short telephone translation and Housing Agency on-site
FY04	\$1,233.30	Housing Agency and State's Attorney's Office
FY 05	\$444.03	State's Attorney's Office and Sheriff's Office
FY06	\$290.61	State's Attorney's Office and Office on Aging
FY07	\$763.52	Sheriff's Office, Harford County Public Library (HCPL) and Dept. of Community Services
FY08	\$288.81	Office on Aging and Revenue Collection
FY09	\$609.95	Revenue Collections, HCPL and Family Support Division, State's Attorney's Office
FY10	\$1,776.77	Family Support Division, State's Attorney's Office, Evidence Translation, HCPL
FY11	\$4,055.66	State's Attorney's Office, HCPL, Revenue Collection
FY12	\$433.04	Board of Election, Human Relations, State's Attorney's Office
FY13	\$707.12	State's Attorney's Office, Department of Community Services
FY14	\$59.57	State's Attorney's Office, HCPL

We will continue to try and identify emerging populations as updated Census and American Community

Language Translation Services Usage by Service and Language					
FY	Total Contact s	#Document/Languag e	On- Site/Language	Telephonic/Language	Video Transcript/Language
2003	9			9/6 Spanish; 2 Vietnamese; 1 Turkish	
2004	12		7/Spanish	5/Spanish	
2005	10		2/Spanish	8/2 Chinese; 6 Spanish	
2006	7		1/Greek	6/3 Spanish; 1 Chinese; 1 German; 1 Urdu	
2007	10	2/Spanish		8/6 Spanish; 2 Cantonese	
2008	13	1/Spanish		12/1 Thai; 11 Spanish	
2009	9	4/Spanish		5/Spanish	
2010	11	5/4 Spanish; 1 German		3/2 Spanish; 1 Punjabi	1/English and Spanish
2011	18	9/6 Spanish; 3 German		9/7 Spanish; 1 Korean; 1 Russian	
2012	5	2/Spanish	1/Spanish	2/Spanish	
2013	13	5/1 Spanish; 3 German; 1 Turkish		8/5 Spanish; 3 Urdu	
2014	3			3/Spanish	

Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to assess the frequency of contact.

To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)

Information from Community Organizations that Serve LEP Persons

To supplement the Census, education, and labor department data, Harford Transit LINK may consider whether appropriate outreach to LEP persons would increase frequency of contact with LEP groups if it is deemed that the frequency of contact warrants it.

Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

What the Guidance Says:

"The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed (emphasis added). The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual..." (DOT LEP Guidance Section V(3)). "providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment." (DOT LEP Guidance Section V (4)).

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Harford Transit LINK provides the following programs, activities and services:

Harford Transit operates ten (10) public bus routes including the Cecil/Harford Connect JARC Route. The Harford County Routes operate Monday through Friday by primarily serving the County's population centers in Havre de Grace, Aberdeen, Bel Air, Edgewood, Joppa and points in between by linking citizens with various destinations such as places of employment, educational services, medical treatment facilities, senior centers and other places of commerce.

Harford Transit also provides specialized transportation services in Harford County through its curb-to-curb service for the elderly and persons under the age of 60 with disabilities or low income.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that the frequency of services needed seems to be very low. We will continue to monitor the frequency of requests and then evaluate based on the services requested which (if any) routes or services are deemed to be of particular importance LEP persons in the community.

The following are believed to be the most critical services provided by Harford Transit LINK for all customers, including LEP persons.

- Safety and security awareness instructions
- ADA paratransit services, including eligibility process (in Ride Guide)
- ADA/Reduced Fare Application and letter
- Language Link Information
- Ride Guide

Factor 4: The Resources Available to the Recipient and Costs

This last step in the four factor analysis will allow your agency to weigh the demand for Language assistance against the agency's current and projected financial and personnel resources. This analysis should help your agency determine if the language services it currently provides are cost effective and should also help agencies plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of agency resources.

What the Guidance Says:

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. (emphasis added). Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. Resource and cost issues, however, can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, affected populations, and Federal agencies." (Section V(4)).

The DOT LEP Guidance also notes that, *"large entities and those entities serving a significant number or proportion of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to be able to articulate, through documentation or in some other reasonable manner, their process for determining what language services would be limited based on resources or costs." (Section V (4)).*

Factor 4: Assessment of the Resources Available to the Agency and Costs

The following language assistance measures are currently being provided by Harford County in general as well as Harford Transit LINK.

As you will note from the above text and chart, LEP services in Harford County are very infrequently requested. The estimated staff needed for the infrequent use these services is practically zero (because the costs are borne by the County). Harford County outsources these services as listed above.

Based on the chart and text above Harford County does not believe that there will be a significant increase in these activities and costs will likely stay relatively stable. As we notice spikes in requested services, Harford County will then reassess the need for services and increased cost.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Harford Transit LINK has determined that the services currently provided are meeting the needs of the LEP community. Harford Transit LINK will continue to track the information as stated in this plan and assess the future needs as appropriate.

Resources

The available budget that would be devoted to additional language assistance expenses will be based on the frequency and types of services determined to be needed. As mentioned above, this amount is likely to stable over the foreseeable future.

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

LEP Implementation Plan

Conclusion: Developing the Right Mix of LEP Services

Harford County, Maryland's four-factor analysis helped determine that we need to continue offering services to the LEP Population to ensure their full participation in the community. The specific steps that will be taken will depend on the information we regularly gather from Census and other data, from fieldwork with LEP individuals and the organizations that serve them, and from our analysis of agency resources and the costs of providing language assistance.

Current Services provided to the LEP Population (Above the recommended requirements) ACTION:

Based on Harford County, Maryland's four-factor analysis, Harford County has established the following policy for providing information to individuals with Limited English Proficiency (LEP):

Harford County, Maryland is always seeking opportunities to increase opportunities for public comment on its activities, including policies, programs, and funding cycles. Harford County is particularly interested in increasing opportunities for historically underserved populations to provide input regarding its planning and housing rehabilitation activities. We will continue to analyze various reports and Census data to determine if there may be a need for other translation services. Pending confirmation of these findings Harford County will continue to provide language services.

Recognizing that providing language translation services up and above the DOT recommendations helps enable LEP residents speaking a variety of languages to acquire information regarding Harford County's human services, Harford County has signed contracts with State of Maryland vendors of telephonic, on-site, and document translation services. These contracts provide translation for hundreds of languages and assist employees in providing services to LEP residents calling or walking in, as well as providing on-site translators and document translation services. Harford County has appointed the Department of Community Services as the overseer of the LEP services to ensure that they are advertised to the community and available to all. Instructions for providing service to individuals

with limited English proficiency can be found below. Harford County employees may also receive a "Point Card" for walk-in translation services by contacting Rachel Harbin, Department of Community Services at 410-638-3373 or by email raharbin@harfordcountymd.gov.

Specific transportation related usage of the LEP services:

In an effort to ensure that all of Harford Transit LINK's transportation services are accessible to LEP persons, Harford County Transit continues to have access to and promote the LEP services listed below. Transit employees are able to immediately access over the phone translation for any language whether over the phone or in person. In addition, printed materials such as the Harford Transit LINK's Ride Guide can be translated into any language as requested by a LEP person.

Although the four factor analysis, and all of the data collected since 2003 data shows that very few documents are requested by persons with LEP. The Harford Transit LINK continues to strive to serve LEP individuals as stated in the above text. At this time to define specific documents that are most needed would somewhat premature. That being said Harford Transit LINK has determined that the following types of language assistance would be most feasible to print as requested.

- Translation of documents as requested into Spanish. These documents include:
 - Application for reduced fare (or services provided as stated in the Translation Services and LEP Practices guidelines for LEP individuals)
 - ADA Paratransit application package,
 - Passenger policies and procedures
 - Safety & Security information sheet
 - Harford County Current Translation Services and LEP Practices

Staff Access to Language Assistance Services

Agency staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

Responding to LEP Callers

Agency staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

Responding to Written Communications from LEP Persons

Agency staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

Responding to LEP Individuals in Person

Agency staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

The following procedures are followed by operators when an LEP person has a question on board a Harford Transit LINK vehicle: The bus operator may hand them a copy of the translation services available as stated on pages 41 - 42 of this document.

Staff Training

As noted previously, all Harford Transit LINK staff is provided with a list of available language assistance services as stated on Pages 41 - 42 of this document.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive tri-annual refresher training on policies and procedures related to assisting LEP persons.

Providing Notice to LEP Persons

LEP persons are notified of the availability of language assistance through the following approaches:

- Our Title VI policy statement included as a vital document
- Through signs posted on our vehicles and in our customer service and administrative offices
- Through ongoing outreach efforts to community organizations, schools, and religious organizations for major service changes or fare increases
- use of Harford County's "Translation Services and LEP Practices" instruction sheets

LEP persons will also be included in all community outreach efforts related to major service changes and fare increases.

Monitoring/updating the plan

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Harford Transit LINK will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, internal meetings with staff who assist LEP persons, review of updated Census data, of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

Based on the feedback received from community members and agency employees, Harford Transit LINK will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. Since the cost of proposed changes and the available resources will affect the enhancements that can be made, therefore Harford Transit LINK will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Harford Transit LINK will strive to address the needs for additional language assistance.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b) (1) (vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

Harford Transit LINK does not have transit-related, non-elected planning board, advisory council or committee, or similar committee, the membership of which we select. Our policies (advisory bodies) are driven by the elected officials within Harford County.

VIII. REQUIREMENTS OF TRANSIT PROVIDERS

REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive federal financial assistance, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub-recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

Harford Transit LINK's: Title VI System-Wide Standards and Policies

Harford Transit LINK, an Agency of the Harford County, Maryland, government, operates fixed route service within Harford County.

The mission of the Harford Transit LINK is to provide the public with a safe and efficient transportation system that increases access and mobility, reduces congestion, improves the environment and supports economic development, thereby enhancing the quality of life throughout Harford County.

Overview of Routes

Harford Transit LINK operates nine (9) public bus routes and one (1) Regional JARC route with Cecil County, operating Monday through Friday by primarily serving the County's population centers in Havre de Grace, Aberdeen, Bel Air, Edgewood, Joppa and points in between by linking citizens with various destinations such as places of employment, educational services, medical treatment facilities, senior centers and other places of commerce. These routes run Monday-Friday from approximately 5:40 a.m. to 7:30 p.m.

- Route 1& 1A (Green Line): Havre de Grace, Aberdeen, Bel Air
- Route 2 & 2A (Blue Line): Joppatowne, Abingdon, Edgewood, Bel Air
- Route 3 (Orange Line): Bel Air Circulator
- Route 4 (Yellow Line): Aberdeen Circulator
- Route 5 (Red Line): Edgewood Circulator
- Route 6 & 6A (Purple Line): Aberdeen, Perryman, Riverside, Edgewood
- Route 7 (Teal Line): Aberdeen, Havre de Grace, Perryville (Regional JARC Route)

The following standards and policies address how Harford Transit LINK's fixed route services are distributed across the system, and they ensure that service design/operations do not result in discrimination based on race, color, or national origin. The standards and policies fulfill the requirements set out in FTA Circular 4702.1B "Title VI Requirements and Guidelines for FTA Recipients." (Please refer to Appendix G for related population, demographic and route maps.)

Service Standards

Per FTA Circular 4702.1B, the following service standards are required: vehicle load, vehicle headway, on-time performance and service availability.

Vehicle Load

Vehicle load is a ratio of the number of passengers on a bus to the total number of seats. Vehicle loads greater than 100 percent indicate standees, and may begin to impact passenger comfort and safety. The Harford Transit LINK vehicle fleet includes vehicles with varying seating and standee limitations; however, the standards below apply to all vehicle types.

	Bus Routes
Peak	127% maximum average
Off-Peak	100% maximum average

Vehicle Headway

Vehicle headway is the amount of time between two vehicles on a route, measured in minutes and stated in published schedules. Headway is related to frequency; the shorter the vehicle headway, the more frequent the service. Within the system, current headways range from 45-90 minutes on our fixed routes. These headways are based on population density and demand for service.

	Bus Routes
Monday - Friday Peak	90 minute maximum
Monday - Friday Off-Peak	60 minute maximum

On-Time Performance

On-time performance is a measure of dependability and schedule adherence, based on the percentage of runs completed as scheduled. Harford Transit LINK defines its “on-time” window as 0 to 10 minutes late, with no vehicle leaving a time point early. On-time performance will be determined at origins, destinations, and specific time points on each route. On-time performance is measured by daily random checks performed and recorded by dispatchers. If it is determined that a driver is ahead of schedule, the manager is notified and a meeting is set with the driver to discuss necessary improvement.

	Bus Routes
Percent On-time	85%

Service Availability

Service availability refers to the distribution of routes within Harford Transit LINK’s service area. Harford County varies greatly in population density and land use patterns and thus necessitates a range of Harford Transit LINK services. Service availability can be measured by both the distance between bus stops (stop spacing) and the percentage of residents within a certain distance of a route or stop (population coverage). Stop Spacing impacts the average speed of service, creating a tradeoff of maximizing availability and maintaining reasonable travel times. Likewise, offering coverage to as many Harford County residents as possible must be balanced with the priority of serving high ridership areas more frequently.

	Bus Routes
Stop Spacing	Minimum of every $\frac{1}{4}$ to $\frac{1}{2}$ mile within the county of Harford as safety permits and where the speed limit is less than 40 mph. In instances where there may be greater distances Harford Transit LINK will honor customer requests to call in for a flag stop where stops are separated by more space as long as it is safe to stop (according to our Policy Manual) and board passengers.

Service Standards

Per FTA Circular 4702.1B, the following service policies are required: Harford Transit LINK amenities and vehicle assignment.

Distribution of Amenities

Harford Transit LINK amenities are “items of comfort, convenience, and safety” available to riders. They include but are not limited to: seating, shelters/canopies, information (signs, maps, schedules and digital displays). The distribution of amenities throughout the system is generally a function of ridership. Harford Transit Link currently has no owned amenities. Harford Transit LINK will distribute Harford Transit LINK amenities equitably throughout the service area based on boarding levels. It will prioritize major transfer points and stops along multiple routes.

Vehicle Assignment

Vehicle assignment is the process by which vehicles are placed into service throughout the system. The Harford Transit LINK vehicle fleet includes a range of vehicle ages. All vehicles are equipped with wheelchair ramps or lifts. Vehicles are assigned to routes based on ridership demand.

All buses are of a similar seating size and features and so are assigned at random, without regard to age or service area. All of the buses in Harford Transit LINK’s fleet are equipped with bike racks.

Monitoring Title VI Complaints

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed. In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the annual grant application (ATP) for submission to the MTA.

Fare and Service Changes

Harford Transit LINK follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed major service or fare change, Harford Transit LINK considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for major changes to existing services or fares, as well as new services, have a goal of providing equitable service.

Appendix A

BARRY GLASSMAN
HARFORD COUNTY EXECUTIVE



BILLY BONIFACE
DIRECTOR OF ADMINISTRATION



KAREN HOLT
DIRECTOR
DEPARTMENT OF ECONOMIC
DEVELOPMENT



ROBERT K. ANDREWS
ADMINISTRATOR
HARFORD TRANSIT LINK

HARFORD COUNTY GOVERNMENT

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Harford Transit's Non-Discrimination Policy

The Harford Transit LINK is committed to ensuring that no person is excluded from participation in or denied the benefits of transit services we offer consistent with the requirements of Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal Financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

If you believe you have been subjected to discrimination under Title VI based on your race, color, or national origin, then you may file a complaint.

Complaints may be filed within one-hundred-eighty (180) days following the date of the alleged discriminatory action. Complaints may be filed in writing using the complaint form found at <http://www.harfordcountymd.gov/services/downloads.cfm?FormID=1940>

If you have any questions, concerns, would like the complaint form and/or additional information regarding Title VI, please contact the Harford County Office of Human Relations:

Susan E. Fisher, Manager
Office of Human Relations and Mediation
125 N. Main Street
Bel Air, MD 21014

410-638-4739

humanrelations@harfordcountymd.gov

Note: This notice is posted on our website, transit office bulletin board and in all federally funded vehicles.



Appendix B

HARFORD COUNTY HUMAN RELATIONS COMPLAINT FORM (Under provision of the Harford County Charter 95Discriminatory Practices)

Please fill in the information below as completely as possible and return this form to the Office of Human Relations, 125 N. Main Street., Bel Air, MD 21014, (410) 638-4739, humanrelations@harfordcountymd.gov.

COMPLAINANT INFORMATION					
Name:		Telephone:		Email:	
Street Address:			City:	State:	Zip:
Mailing Address:			City:	State:	Zip:
RESPONDENT INFORMATION					
Name:			Telephone:		
Street Address:			City:	State:	Zip:
Mailing Address:			City:	State:	Zip:
ALLEGED DISCRIMINATORY INCIDENT					
Basis for Discrimination: <i>Check all that apply.</i>			Discriminatory or Wrongful Practice Involving:		
			<i>Check all that apply.</i>		
<input type="checkbox"/> Race	<input type="checkbox"/> Occupation	<input type="checkbox"/> Administration of Justice	<input type="checkbox"/> Governmental Services		
<input type="checkbox"/> Creed	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Education	<input type="checkbox"/> Housing		
<input type="checkbox"/> Color	<input type="checkbox"/> Political Opinion	<input type="checkbox"/> Employment	<input type="checkbox"/> Public Accommodations		
<input type="checkbox"/> Sex	<input type="checkbox"/> Personal Appearance	<input type="checkbox"/> Other: <i>Please specify.</i>			
<input type="checkbox"/> Origin	<input type="checkbox"/> Mental Handicap				
<input type="checkbox"/> Age	<input type="checkbox"/> Physical Handicap				
Give the name, address and telephone number of any other agency you contacted about this complaint:			Have you filed a complaint with the Office of Human Relations previously? <input type="checkbox"/> Yes <input type="checkbox"/> No Date of Previous complaint: _____		
How did you hear about the Office of Human Relations?					
Date of Incident:			Time of Incident:		

Did anyone witness the events you described above? ☐ Yes ☐ No Please list the name, address and telephone number (if possible) of this person(s):

Describe what happened:

Parties to complaints may voluntarily resolve their differences without an extensive investigation or expenditure of resources by participating in a mediation process. Are you interested in participating in such a process? ☐ Yes ☐ No

I do hereby attest that I have submitted the foregoing complaint and to the best of my knowledge, it is true and correct.

Signature of Complainant

Date

Sworn to and Scribed: Before me this _____ day of _____, _____.

Notary Public: _____

Commission expires: _____

Affix Seal

Appendix C

Title VI List of Investigations, Lawsuits and Complaints



Harford Transit LINK



List of Investigations Lawsuits and Complaints	Date Include (Month, Day, Year)	Summary Include basis of complaint: Race, Color or National Origin	Status	Action Taken
Investigation Number 1				
Investigation Number 2				
Investigation Number 3				
Investigation Number 4				
Lawsuit Number 1				
Lawsuit Number 2				
Lawsuit Number 3				
Lawsuit Number 4				
Complaint Number 1				
Complaint Number 2				
Complaint Number 3				
Complaint Number 4				

Appendix C – 1

TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS LOG (EXAMPLE)

In order to comply with 49 CFR Section 21.9(b), recipients and sub-recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or sub-recipient that allege discrimination on the basis of race, color, or national origin.

Agencies awarded Federal grants through the Maryland Transit Administration (MTA) must complete this log at the end of each quarter and at the end of each Fiscal Year, providing the requested information. Specified data is required each quarter, as instructed below. Certain information is required only at the end of the Fiscal Year, as instructed below. End-of-year information must be provided in print and electronically, using Microsoft Word.

Note: The Investigations, Complaints & Lawsuits Log must be submitted with your Quarterly Request for Payment.

AGENCY: Harford Transit LINK

TITLE VI OFFICER: Susan E. Fisher

E-MAIL: sefisher@harfordcountymd.gov. **CONTACT #:** 410-638-4739

FISCAL YEAR FY 12

REPORTING PERIOD (check appropriate box):

☐ 1ST Quarter ☒ 2ND Quarter ☐ 3RD Quarter ☐ 4TH Quarter ☐ Complete Fiscal Year
(Jul-Sep) (Oct-Dec) (Jan-Mar) (Apr-June) (Jul-June)

1. Were any investigations, lawsuits or complaints filed during this time period? 0
2. If YES, please provide the following information for each investigation, lawsuit or complaint received during this time period:
 - Date the investigation, lawsuit or complaint was filed, and
 - Summary of the allegation(s) and status if resolved.
3. Based on the investigations, lawsuits or complaints filed during the Fiscal Year, please provide a status of each allegation. **(Report on separate paper at the end of the Fiscal Year).**
4. Please indicate if or what actions were taken by the recipient or sub-recipient in response to the investigation, lawsuit or complaint. **(Report on separate paper at the end of the Fiscal Year).**

Appendix D

Procedures for notifying the public of Title VI rights and how to file a complaint

The Harford Transit LINK includes the following language on printed information materials (within reason), on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service as described below:

Principles of Harford Transit LINK's Communications & Public Involvement Program

Communications and Public Involvement applies to and affects Harford County's work program as a whole, particularly agency efforts and responsibilities related to the Harford Transit LINK's Transportation Planning Program Area. The goal of Harford Transit LINK's General Communications and Public Involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions by Harford Transit LINK. In seeking public comment and review, Harford Transit LINK makes a concerted effort to reach all segments of the population, including people from protected communities, and organizations representing these and other protected classes. Harford Transit LINK utilizes a broad range of public information and participation opportunities, process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

Elements of Harford Transit LINK's Communications & Public Involvement Program

- **Website** – Harford Transit LINK maintains a website, (as part of Harford County, Maryland's website) www.harfordcountymd.gov/services/transportation, which is updated as new information becomes available. The site includes information on the agency's responsibilities, programs, publications, meeting dates, and news items, contact information; a search function, the Title VI Plan, complaint procedures, and complaint form. We also developed a website place where you can email the Harford Transit LINK to help encourage people to participate in several ways such as: signing up to receive text messages and e-mail updates for attending meetings, requesting a speaker, or contacting the office for other information.
- **Publications** – Each year or as needed, the Harford Transit LINK issues publications, reports and maps as part of the agency's work program and respond to and processes a number of data requests. The information is used by planning agencies and various departments throughout the county/region, and can be accessed by the public through the Harford Transit LINK's website www.harfordcountymd.gov/services/transportation or by submitting specific requests to our office: 1311 Abingdon Road, Abingdon, MD 21009.
- **Press releases** – Press releases are occasionally sent to local and regional media outlets including daily and weekly newspapers, TV stations, and radio stations. Press releases may include the abbreviated Title VI Notice to the public and contact information for agency staff.
- **Opportunities for public comment** – Harford Transit LINK provides opportunities for public comment, and continues to work to find new and innovative ways to solicit public comments and involve all segments of the population in Harford County, Maryland. Comments are accepted by phone, fax, e-mail, U.S. mail, and in person at any of the meetings. See the section below entitled "Opportunities for Public Comment" for details.
- **Harford Transit LINK's Staff is accessible** – Staff is accessible in person, on the phone or TTY, by mail, by fax, by e-mail, or by online comment forms. Contact information for the Harford Transit LINK's staff is provided on the agency's website.
- **Mailings** – Harford Transit LINK may use direct mail to keep the public informed of the agency's programs, public comment periods, meetings, and publications. See the next section for details.
- **Events** – Events such as workshops, open houses, and forums are held as deemed necessary.

Opportunities for Public Comments

Harford Transit LINK offers several different ways for people to comment on activities, programs, and decisions made at the agency as follows:

- **Comments are accepted at any time** – Comments are accepted via an online comment form, or by phone, fax, e-mail, U.S. mail, and in person at the office or during any community meeting or event. Contact information for staff is provided on the agency website and contact information (as required) is included in every publication produced by Harford Transit LINK.
- **Formal public comment periods for major activities** – Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, Harford Transit LINK's Annual Transportation Plan (ATP) report, major changes to important Harford Transit LINK policies, and major updates to the Transportation Development Plan. Generally, information is reviewed and released during a public hearing. The comment period is highlighted in the newspaper notification and on the home page of the website, and legal notices are distributed throughout the County. Comments can be made in person at any public meeting, using a comment form to be added on the agency's website, by e-mail, by U.S. mail or fax. Harford Transit LINK responds to comments received when appropriate, and forwards comments to other agencies for a response when appropriate. Comments and responses received throughout the comment period are reviewed and considered at this time, prior to action.
- **Public Hearings** – Harford Transit LINK may participate in public hearings during major updates to the County's Transportation Plan or when undergoing the process for issuing an Environmental Impact Statement (EIS).

Procedures for notifying the public of Title VI rights and how to file a complaint

Harford Transit LINK includes the following language (or reasonably similar, explicit or abbreviated language) on printed information materials, on the agency's website, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Harford Transit LINK is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Harford Transit LINK's nondiscrimination policies and procedures, please visit the website at <http://www.harfordcountymd.gov/services/transportation> or humanrelations@harfordcountymd.gov and/or contact Sylvia Bryant, Manager, Office of Human Relations, 410-638-4739, 145 N. Main Street, Bel Air, MD 21014.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service. To obtain a copy of the complaint form, go to <http://www.harfordcountymd.gov/services/downloads.cfm?FormID=1940> See Appendix E for Policy Statement, Appendix F for Sign Posted in the buses and Appendix G for the Complaint Form. Other relevant information about Title VI is also included within Harford Transit LINK's Policy Manual, Ride Guide brochure and schedules.

Appendix E

Harford County Current Translation Services and LEP Practices:

BARRY GLASSMAN
HARFORD COUNTY EXECUTIVE



BILLY BONIFACE
DIRECTOR OF ADMINISTRATION



KAREN HOLT
DIRECTOR
DEPARTMENT OF ECONOMIC DEVELOPMENT



ROBERT K. ANDREWS
ADMINISTRATOR
HARFORD TRANSIT LINK

HARFORD COUNTY GOVERNMENT

Harford County's Language Translation Services for Individuals with Limited English Proficiency (LEP)

Harford County Government provides the following Language Translation Services to individuals with Limited English Proficiency (LEP): *Telephonic, Walk-In, Scheduled In-Person* and *Written Document*. To access these services, please follow the instructions below. In the event that you need assistance, please contact the Disabilities Coordinator:

Rachel Harbin
319 South Main Street, Bel Air, MD 21014
410-638-3373, raharbin@harfordcountymd.gov

Telephonic: Placing or Receiving a Call Requiring Translation Services

1. Try to determine the language of the caller and ask them to wait while you get assistance. (If you cannot, the Language Line operator will help you.)
2. **Call Language Line services at 1-866-874-3972.** You will hear an automated message and be asked to enter the six digit Client ID **530405**, your department/agency, and the language the individual is speaking. Three way calls may be arranged by telling the Language Line operator the name and telephone number of the third party. You may also arrange a conference call by consulting the telephone user guide for your phone system. For assistance in making a conference call, contact your telecommunications representative. For Customer Service, please call 1-800-752-6096.
3. Remember that over-the-phone interpretation is "consecutive" interpretation. This means that there are pauses while the interpreter repeats each statement in the respective language.
4. Begin speaking to the caller, using the first person, ("How can I help you?"). The translator will translate your exact words and the individual's response.
5. All invoices will be sent to the Disabilities Coordinator:

Rachel Harbin
319 South Main Street, Bel Air, MD 21014
410-638-3373, raharbin@harfordcountymd.gov

~Preserving Harford's past; promoting Harford's future~

MY DIRECT PHONE NUMBER IS 410-638-3389
319 SOUTH MAIN STREET, BEL AIR, MARYLAND 21014 • www.harfordcountymd.gov/services
This document is available in alternative format.

Walk-In: For In-Person/Walk-In Translation Services

1. Try to find out what language the individual is speaking. See the “Point to Your Language” cards. If you cannot identify the language, the Language Line operator will help you. If you need more copies of the “Point to Your Language” cards, please send your request to the Disabilities Coordinator, Rachel Harbin (raharbin@harfordcountymd.gov).
 2. **Call Language Line Services at 1-866-874-3972.** You will hear an automated message and be asked to enter the six digit Client ID **530405**, your department/agency, and the language the individual is speaking. For Customer Service, please call For -800-752-6096
 3. When the translator is on the line, put the phone on “speaker”.
 4. Speak directly to the individual, using the 1st person, (“How can I help you?”). The translator will translate your exact words and the individual’s response.
 5. All invoices will be sent to the Disabilities Coordinator:
Rachel Harbin
319 South Main Street, Bel Air, MD 21014
410-638-3373, raharbin@harfordcountymd.gov
-

Written Document: Language Translation for Documents

1. **Send an electronic copy (preferred)** or a paper copy of the document to the Disabilities Coordinator. Include the **language of the original document and the desired language.**
Rachel Harbin
319 South Main Street, Bel Air, MD 21014
410-638-3373, raharbin@harfordcountymd.gov
 2. The Disabilities Coordinator will send the original document to Schreiber Translations, Inc for translation and then forward the translated document once it is received.
 3. Please keep in mind that turn-around time for document translation is normally at least 5 business days.
-

Appendix E

Table – Minority Representation on Committees by Race

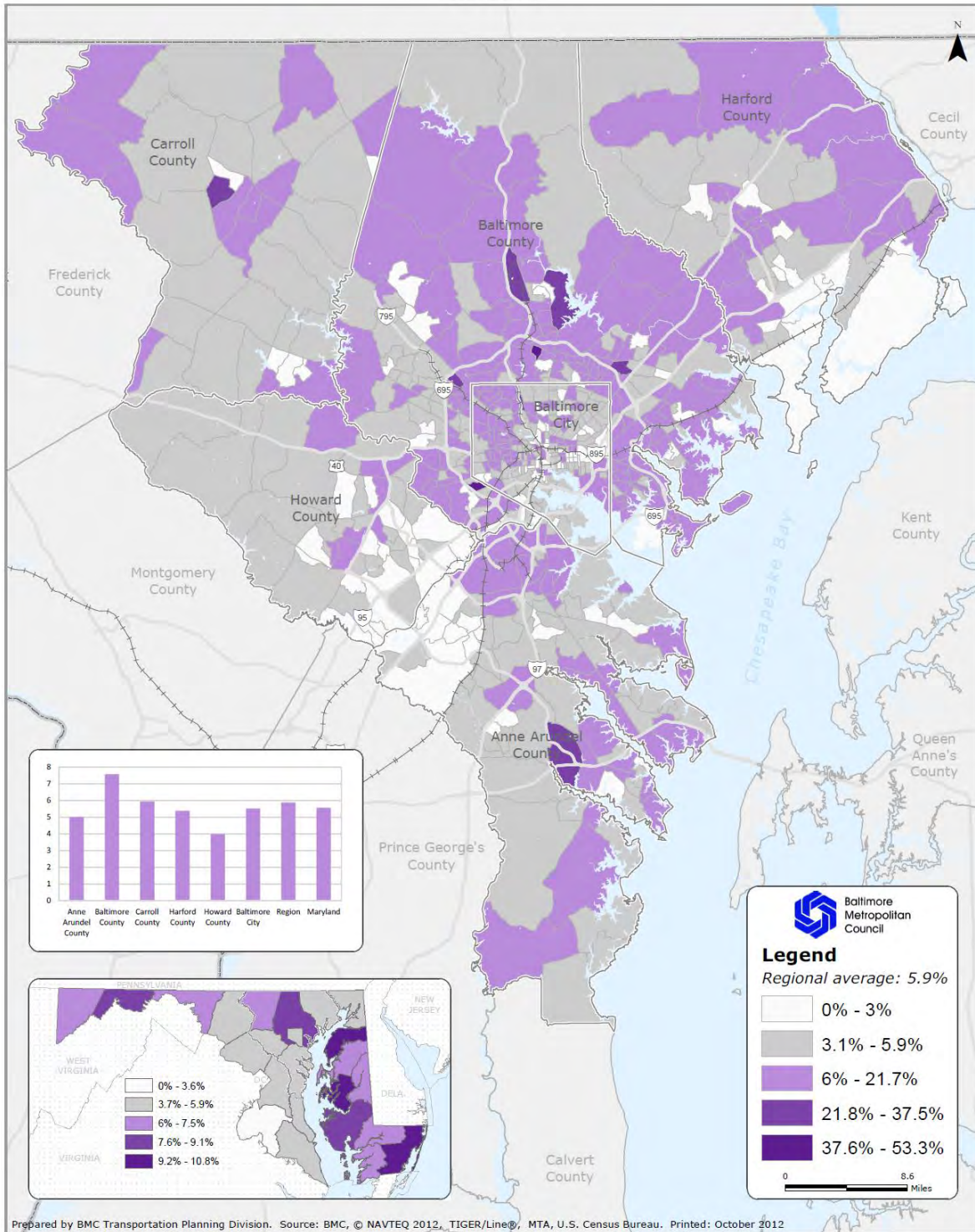
As mentioned in the above text, Harford Transit LINK does not have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. Our policies (advisory bodies) are driven by the elected officials within Harford County.

APPENDIX G

POPULATION, DEMOGRAPHIC AND ROUTE MAPS

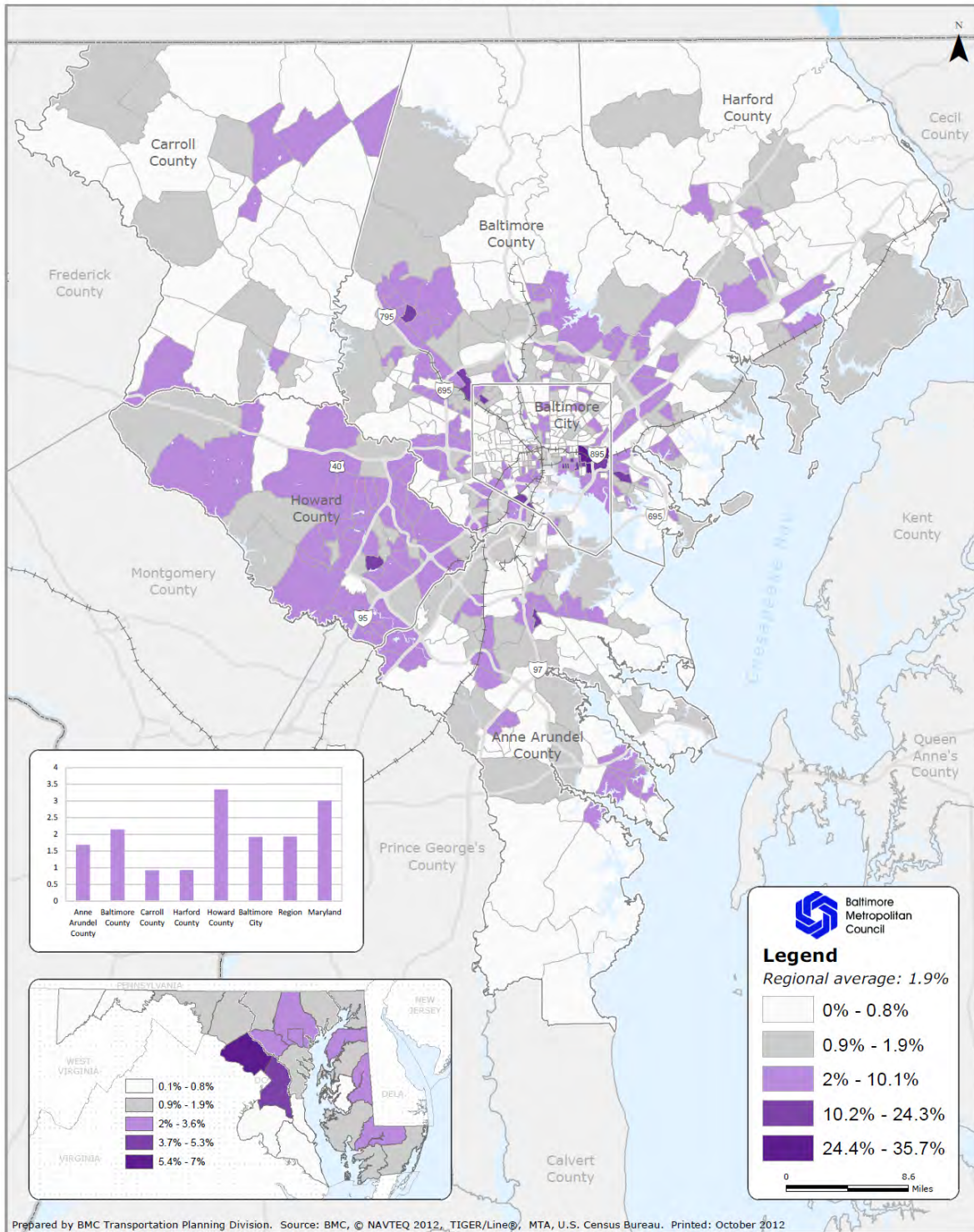
Elderly Population

Percent of total population that is age 75 or older
2010 Census



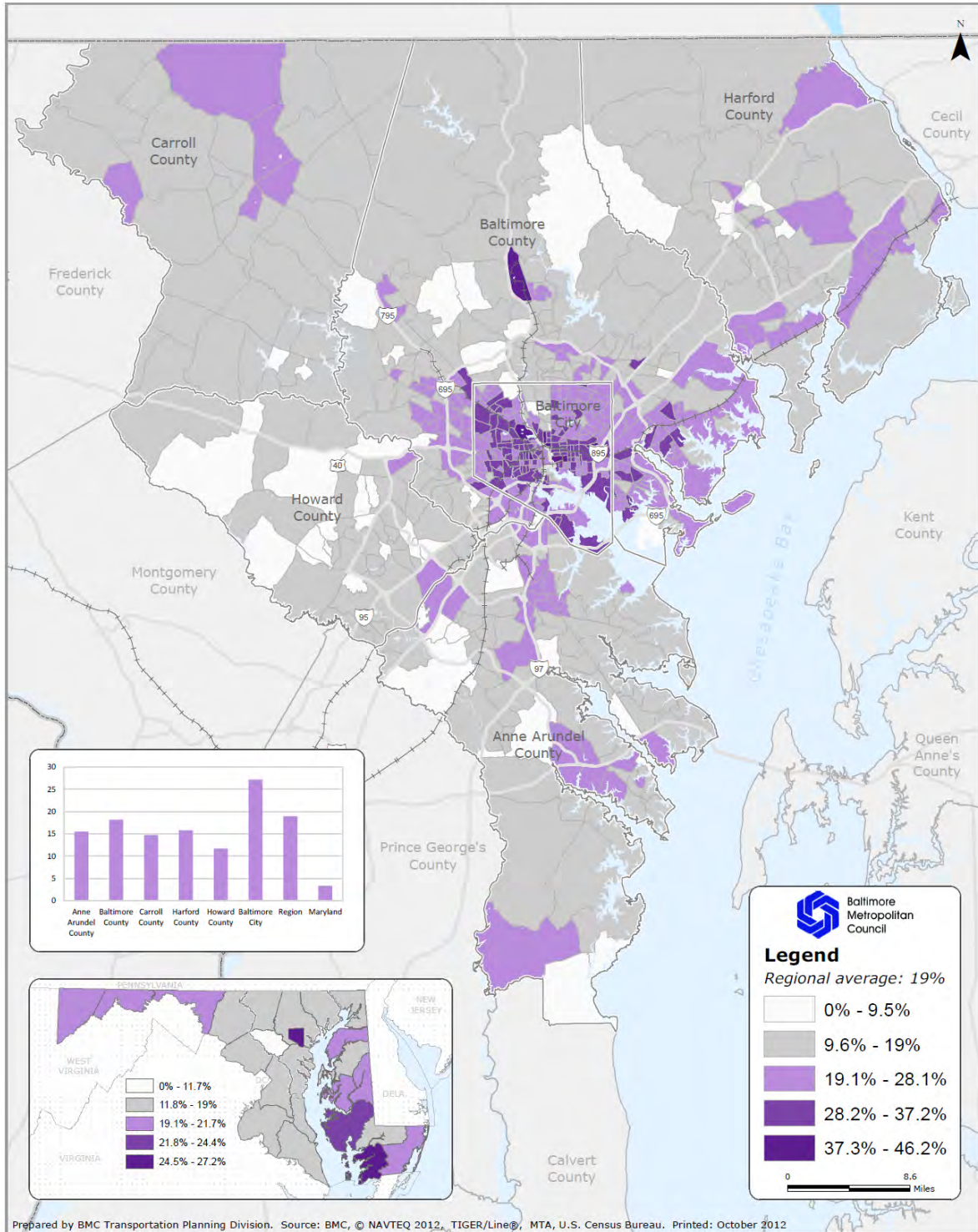
Limited English Proficiency

Percent of population over 5 years old that speaks English "not well" or "not at all"
American Community Survey 2006-2010



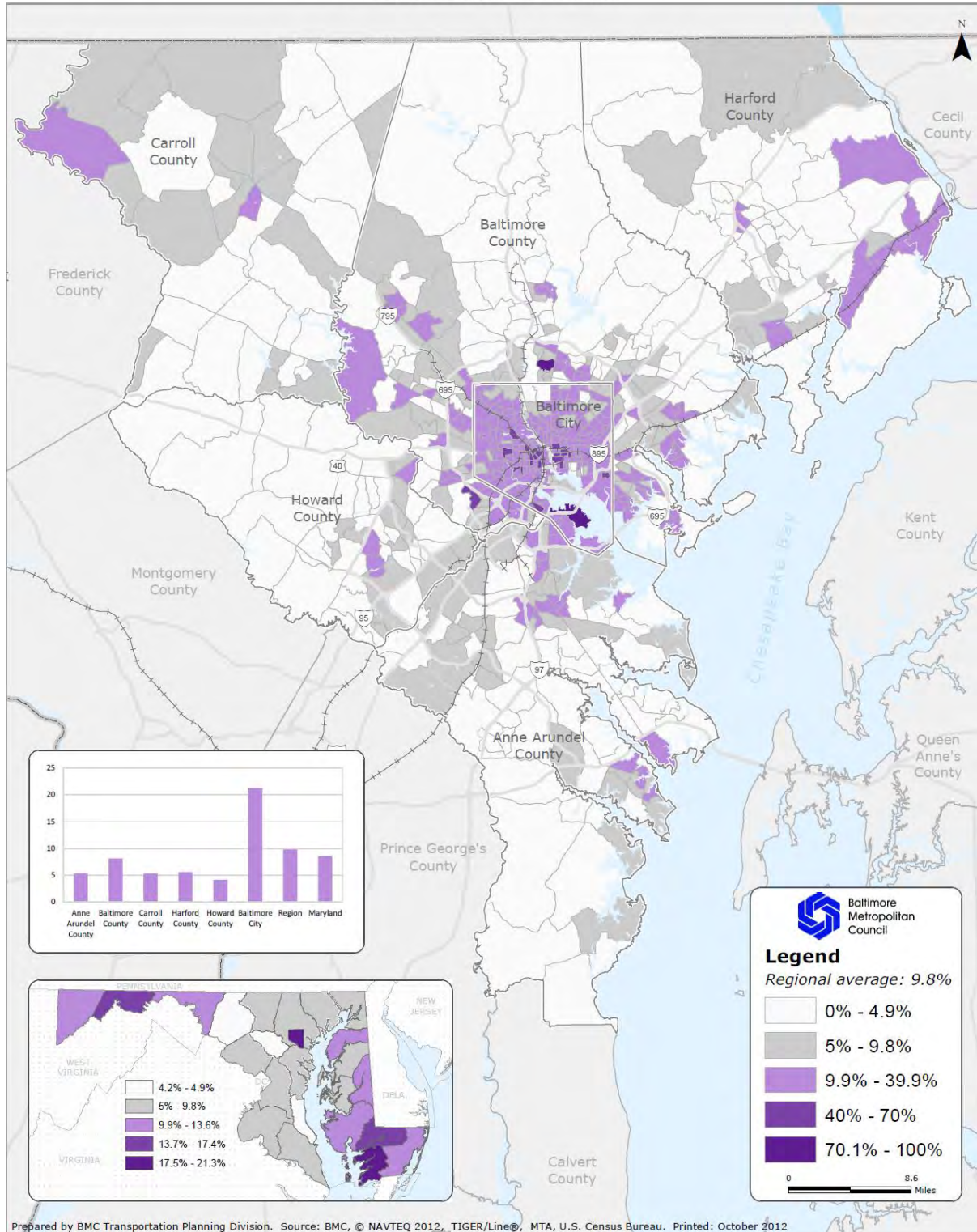
Disabled Population

Percent of population over 5 years old that has a disability
2000 Census



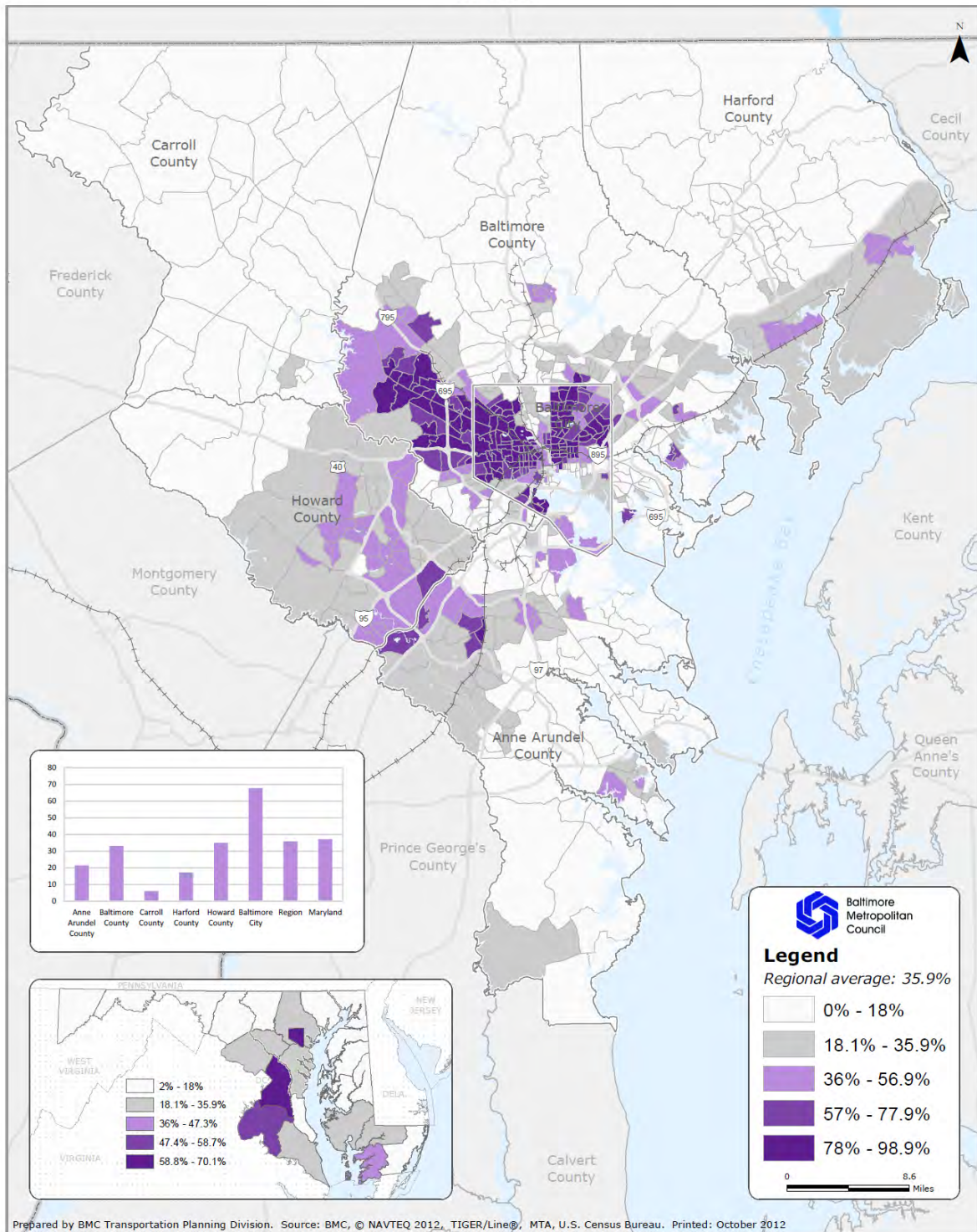
Poverty

Percent of population (for whom poverty status has been determined) whose income is below the poverty level
American Community Survey 2006-2010



Non-Hispanic Minority

Percent of total population that is not White and not Hispanic
2010 Census



Hispanic or Latino Heritage

Percent of total population that is of Hispanic or Latino origin (all races)
2010 Census

